

In The United States District Court  
For the District of Delaware

James Hall,  
Plaintiff

Case No. 04-1328-GMS  
Request for production of  
Documents.

David Holman Et. Al.,

Defendants,



~~Plaintiff's First Request for production of Documents~~

Pursuant to F.R.C.P. 26 And 34 Plaintiff Request that the Defendants produce the following documents. please produce the Documents to Plaintiff. The plaintiff request defendant produce documents Listed herein within (30) day's, either by providing plaintiff with copies or by making them Available to the plaintiff with and for inspection and copying. At Delaware correctional center 1181 Padlock Rd Smyrna 19977. (D.C.C.) Del.

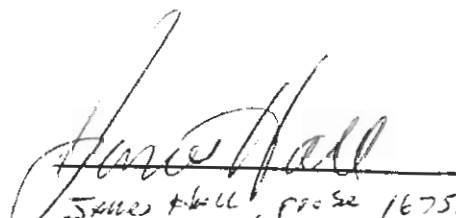
Motion for production of Documents: 1.

1. All documents that mention, contain, constitute, or refer to policies on staff supervision of inmates with threatened bodily harm at the Delaware Correctional Center
2. All documents that contain, mention, constitute, or refer to policies on responses to potential threats on inmate health or safety that are clear or obvious at the Delaware Correctional Center
3. All Documents that contain, mention, constitute, or refer to policies on responses to serious medical need that are clear or obvious at the Delaware Correctional Center.
4. All documents that evidence, mention, or refer to the serious medical need of plaintiff James Hall on 1-22-04 including but not limited to medical records, incident reports, statement and other investigative materials and documents relating to subsequent staff discipline if any
5. Any and all policies, directives or instructions to staff governing threats of bodily harm and sick-call procedures in general, and Segregation separation
6. Any and all documents and reports concerning a disturbance in MHU 23-B after 04-6-04 including but not limited to, disciplinary charges, statement of witnesses, incident reports, findings and conclusion of disciplinary hearing - etc.

7. The complete contents of Plaintiff's Delaware Correctional Center file including but not limited to disciplinary reports, incident reports, evaluations, criminal justice information and medical and mental health records
8. All incident reports that evidence, mention, or refer to incidents of Assault Inmate-Inmate at the Delaware Correctional Center that have occurred from 1-20-03
9. All documents written or created since 1-20-04 that contain mention, constitute, or refer to any inspection inquiry, or complaint about inadequate staffing or supervision of (MTHU #3.) Maximum Housing Unit Building #23, Inadequate medical or substandard medical treatment and serious medical needs at the Delaware Correctional Center, whether formal or informal, official or unofficial including Inmate, Staff, Civilian grievances, Complaints and Appeals and including responses to such documents prepared by Delaware Correctional Center Staff or other agents.
10. A Listing of any and all past litigation that resulted in any Consent Decree and or favorable outcome of inmate plaintiffs whether published or not published which involve the conditions of confinement, medical grievances or medical treatment issues and failure to protect.
11. Any and all policies, directives or instructions to staff governing inmate grievances and the institution's duty regarding same
12. The complete contents of Anthony Coffey's Delaware Correctional Center file including but not limited to disciplinary reports, incident reports, Evaluation criminal justice information and mental health records relating to evaluation of prisoners.

Plaintiff, James Hall, does hereby swear and certify under penalty of perjury that the instant Request for Discovery is careful, not improperly motivated and not unreasonably burdensome or expensive.

Plaintiff seeks pleading leniency under FRASIER v. South Eastern Bell, Inc., 755 F.2d 657, 3 (3<sup>rd</sup> Cir. 1986). and Haines v. Kerner, 404 U.S. 519 (1972) as a pro se incarcerated litigant and friend of the Court

  
James Hall, Pro Se 167551  
1181 Garfield Rd. Dayton OH  
45422

This 26 day of ~~Oct~~ October  
2005

Reluctant production of preserved by

IM James Hall, Jr.  
SBI# 167581 UNIT W-1-G  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977



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U.S.M.S.  
X-RAY